

**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

In the Matter of

Children's Television Obligations  
Of Digital Television Broadcasters

Second Periodic Review of the  
Commission's Rules and Policies  
Affecting the Conversion  
To Digital Television

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MM Docket No. 00-167

MB Docket No. 03-15

**COMMENTS ON THE COMMISSIONS REQUEST FOR INFORMATION  
IN THE FURTHER NOTICE OF PROPOSED RULE MAKING**

Mr. Tim Collings, individually, and Tri-Vision International Ltd. ("Tri-Vision") respectfully file comment to the Commission's request for information in the above mentioned Report and Order and further Notice of Proposed Rule Making.<sup>1</sup> Our comments center on the use of V-chip technology in connection with the Commission's request for tools to help parents deal with interactivity in children's programming.

**BACKGROUND FACTS**

Tim Collings invented the V-chip in 1989. He is a director of Tri-Vision International Ltd., which owns worldwide marketing rights to patented V-chip technology. The V-chip allows televisions to respond to ratings encoded in television programs. Mr. Collings is a member of the ATSC Technology

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<sup>1</sup> FCC 04-221 Paragraph 71-73

and Standards Group (TSG) and the TSG/S8 Committee responsible for developing A/65-B (“*Program and System Information Protocol - PSIP*”). Mr. Collings has also served on CEA R4.3 (Television Data Systems Subcommittee) which developed CEA-766-A (“*U.S. and Canadian Rating Region Table (“RRT”) and Content Advisory Descriptor for Transport of Content Advisory Information Using PSIP*”) and CEB-12-A (“*Recommended PSIP Practice*”).

In 2004, the Commission voted to ensure flexibility in V-chip<sup>2</sup>. As of March 15, 2006, all digital television receiver manufacturers, “...*to ensure the ability to modify the content advisory system, receivers must be able to process newer RRT version numbers or use new rating region codes as suggested by ATSC.*”<sup>3</sup> ATSC A/65-B and CEA-CEB-12-A state:

*“Products should be designed to support and respond to programs rated for more than one rating region. The content advisory descriptor may contain ratings for any or all of the defined rating\_region values, up to a maximum of 8 regions for each program. An example implementation of multi-region support involves offering users a choice to select one or more rating*

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<sup>2</sup> FCC News Release August 4, 2004

<sup>3</sup> FCC 04-192 Paragraph 156

*systems by “activating” the RRT associated with a given rating\_region.”*

While the V-chip allows parents to block programming they believe to be inappropriate for children in their home, the V-chip can also be used to find beneficial programming. The Commission’s Report and Order on Children’s Television Obligations of Digital Television Broadcasters has taken the first step in this process by requiring an on-screen icon to identify educational/informational (E/I) programs.<sup>4</sup> The Commission has stated: “...we also believe that DTV technical standards should not foreclose the option of using V-Chip technology to support multiple rating systems”<sup>5</sup>. A natural second step would be to use the V-chip to find appropriate E/I programs. Each RRT is limited to 1024 bytes and provides the ability to accommodate several ratings. An E/I rating system could easily be established by constructing a RRT to describe one or more E/I ratings.

In the matter before the Commission, V-chip can also be used to help parents control access to interactive program elements by creating additional ratings to describe interactive program elements. Interactive ratings could be described in the E/I RRT, or interactive ratings could be defined in a separate

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<sup>4</sup> FCC 04-221 Paragraph 46-47

<sup>5</sup> FCC 04-221 Paragraph 65

RRT if the E/I RRT does not have sufficient room to accommodate interactive ratings due to the 1024-byte RRT limitation.

## **V-CHIP ENABLED INTERACTIVITY IN CHILDREN'S PROGRAMMING**

While it is not the intent of these comments to determine what interactive elements should or should not be allowed (there are many fine organizations and groups with the best interests of children as their prime responsibility<sup>6</sup>), the V-chip can be used to control access to interactive program elements.

Since the Commission had the foresight to require V-chip flexibility, E/I ratings and interactive ratings can augment the present rating system. It is possible to define ratings to describe interactive program elements. Parents can choose an appropriate level of interactivity, or parents can deactivate the V-chip if they are watching TV with their children and feel that certain interactivity is appropriate.

The following is a sample interactive rating system:

**Interactive Level 0:** *Contains no interactive elements.*

**Interactive Level 1:** *Contains non-commercial interactive elements.*

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<sup>6</sup> Members of the Children's Media Policy Coalition are an excellent example of the valuable assistance available in the area of Children's welfare

**Interactive Level 2:** *Contains commercial elements - requests no personal information.*

**Interactive Level 3:** *Contains commercial elements - requests personal information.*

*(This sample interactive rating system definition should fit within the 1024-byte limitation of the RRT bit syntax structure)*

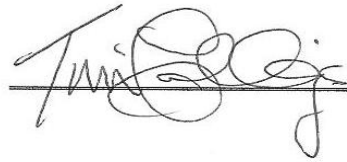
## CONCLUSION

Television, at its best, can open a window to the world, and can provide children with fun, entertaining, insights into a number of subjects – vastly improving their understanding of the world around them. The opportunity to provide additional information and interactivity to improve the level of understanding is a worthy goal.

However, as the Commission correctly points out, interactivity has the potential for abuse. While it may become necessary to curtail interactivity for the protection of children, the V-chip provides an opportunity for parents to assume their role as arbiters of what is acceptable for their children in their home.

The V-chip has the capability to provide parents with reasonable safeguards and allow content providers to maximize the potential of their programming without the necessity of government intervention.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Tim Collings', written over a horizontal line.

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A handwritten signature in black ink, appearing to read 'N.H. Siddiqui', written over a horizontal line.

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